

EX PARTE OR LATE FILED

DOW, LOHNES & ALBERTSON, PLLC  
ATTORNEYS AT LAW

ORIGINAL

JOHN R. FEORE, JR.  
DIRECT DIAL 202-776-2786  
jfeore@dlalaw.com

WASHINGTON, D.C.  
1200 NEW HAMPSHIRE AVENUE, N.W. • SUITE 800 • WASHINGTON, D.C. 20036-6802  
TELEPHONE 202-776-2000 • FACSIMILE 202-776-2222

ONE RAVINIA DRIVE • SUITE 1600  
ATLANTA, GEORGIA 30346-2108  
TELEPHONE 770-901-8800  
FACSIMILE 770-901-8874

November 24, 1998

Magalie R. Salas, Esquire  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, DC 20554

Re: *Ex Parte* Presentation  
Paxson Communications Corporation  
MM Docket Nos. 91-221; 87-7; 87-8; 96-222

RECEIVED

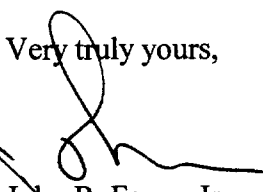
NOV 24 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear Ms. Salas:

Pursuant to Section 1.106 of the Commission's Rules, the attached written submissions to the Commissioners' are submitted in duplicate to be associated with the files in the above-referenced proceedings.

Very truly yours,

  
John R. Feore, Jr.

JRF/lis  
Enclosure

No. of Copies rec'd. 076  
List ABCDE

COPY

DOW, LOHNES & ALBERTSON, PLLC  
ATTORNEYS AT LAW

JOHN R. FEORE, JR.  
DIRECT DIAL 202-776-2786  
jfeore@dlalaw.com

WASHINGTON, D.C.

1200 NEW HAMPSHIRE AVENUE, N.W. • SUITE 800 • WASHINGTON, D.C. 20036-6802  
TELEPHONE 202-776-2000 • FACSIMILE 202-776-2222

ONE RAVINIA DRIVE • SUITE 1600  
ATLANTA, GEORGIA 30346-2108  
TELEPHONE 770-901-8800  
FACSIMILE 770-901-8874

November 20, 1998

RECEIVED

NOV 24 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**VIA HAND DELIVERY**

Chairman William E. Kennard  
Federal Communications Commission  
1919 M Street, N.W., Room 814  
Washington, D.C. 20554

Dear Chairman Kennard:

On behalf of Bud Paxson and Paxson Communications Corporation ("Paxson"), I am forwarding to you Paxson's Proposal for increasing the diversity of television ownership and encouraging the development of emerging television networks through the retention and utilization of the UHF discount and single majority shareholder rule. Paxson has discussed this Proposal with members of the Senate Communications Subcommittee and the House Telecommunications Subcommittee and members of both Subcommittees are expected to contact you to register their support for the Paxson Proposal.

Paxson and Ed Parker continue to work on finalizing their business arrangements for EPCOM, Inc. that were preliminarily outlined for you last week. It should be noted that in addition to the discussion of the single majority shareholder rule in the attached Proposal, it is anticipated that EPCOM, Inc. will have three directors (two designated by Ed Parker and one designated by Paxson) and that Ed Parker will be the President and CEO of the Company. Paxson and Ed Parker intend to submit to the Commission for pre-approval the documentation regarding their venture as soon as those documents are substantially complete.

Best regards.

Cordially yours,

John R. Feore, Jr.

JRF/ljs

Enclosure

cc: Susan Fox, Senior Legal Advisor

---

**POSITIONS FOR FCC POLICY DECISIONS - DECEMBER, 1998  
PRESENTED BY  
PAXSON COMMUNICATIONS CORPORATION**

\* \* \* \* \*

**STATEMENT OF TELEVISION OWNERSHIP  
AND  
A PROPOSAL TO INCREASE BROADCAST DIVERSITY**

The Commission's pending ownership rulemakings should be the vehicle for new rules reflecting the current competitive marketplace and, at the same time, creating a structure that will increase minority, female and new entrant ownership of television stations. There are two significant prongs to this plan.

**Maintain the Existing UHF Discount in Calculating National  
Television Ownership to Encourage Emerging Networks**

- ▶ The discount has been in place for 13 years and has been a major factor in the growth of UHF television.
- ▶ UHF television stations continue to operate with technical and economic disadvantages to VHF stations as consistently reflected in ratings disparities.
- ▶ DTV is continuing the UHF handicap with inadequate power allotments and cable carriage cannot eliminate the UHF/VHF disparity.
- ▶ Retaining the UHF discount serves the Commission's diversity and competition goals by encouraging the development of emerging networks such as PAXTV, WB, UPN, Univision and Telemundo.
- ▶ The emerging networks are built upon UHF stations and must, to be economically viable, own a significant portion of their distribution.

**Retain the Single Majority Shareholder Rule as a Vehicle for Increasing  
Minority, Female and New Entrant Ownership of Television Stations**

- ▶ The single majority shareholder rule will permit the emerging networks to hold up to 49% of the voting stock of a female, minority or new entrant-controlled station without having that station be attributable to the emerging network for either national or local ownership purposes.
-

- 
- ▶ The emerging network would provide programming to the station via a standard Affiliation Agreement.
  - ▶ The emerging network would work with the majority owner to obtain third party (e.g., bank) financing for the construction or purchase of the station.
  - ▶ The emerging network would not have any option to purchase the station.
  - ▶ The station licensee would be provided with significant time on a daily basis for the broadcast of non-network, local programming.
  - ▶ The single majority shareholder would be in control of the ownership, programming, operation and ultimate disposition of the station.
-

COPY

DOW, LOHNES & ALBERTSON, PLLC  
ATTORNEYS AT LAW

JOHN R. FEORE, JR.  
DIRECT DIAL 202-776-2786  
jfeore@dlalaw.com

WASHINGTON, D.C.  
1200 NEW HAMPSHIRE AVENUE, N.W. • SUITE 800 • WASHINGTON, D.C. 20036-6802  
TELEPHONE 202-776-2000 • FACSIMILE 202-776-2222

ONE RAVINIA DRIVE • SUITE 1600  
ATLANTA, GEORGIA 30346-2108  
TELEPHONE 770-901-8800  
FACSIMILE 770-901-8874

November 20, 1998

**VIA HAND DELIVERY**

Chairman William E. Kennard  
Federal Communications Commission  
1919 M Street, N.W., Room 814  
Washington, D.C. 20554

Dear Chairman Kennard:

On behalf of Bud Paxson and Paxson Communications Corporation ("Paxson"), I am forwarding to you Paxson's Proposal for increasing the diversity of television ownership and encouraging the development of emerging television networks through the retention and utilization of the UHF discount and single majority shareholder rule. Paxson has discussed this Proposal with members of the Senate Communications Subcommittee and the House Telecommunications Subcommittee and members of both Subcommittees are expected to contact you to register their support for the Paxson Proposal.

Paxson and Ed Parker continue to work on finalizing their business arrangements for EPCOM, Inc. that were preliminarily outlined for you last week. It should be noted that in addition to the discussion of the single majority shareholder rule in the attached Proposal, it is anticipated that EPCOM, Inc. will have three directors (two designated by Ed Parker and one designated by Paxson) and that Ed Parker will be the President and CEO of the Company. Paxson and Ed Parker intend to submit to the Commission for pre-approval the documentation regarding their venture as soon as those documents are substantially complete.

Best regards.

Cordially yours,



John R. Feore, Jr.

JRF/lis

Enclosure

cc: Susan Fox, Senior Legal Advisor

---

**POSITIONS FOR FCC POLICY DECISIONS - DECEMBER, 1998  
PRESENTED BY  
PAXSON COMMUNICATIONS CORPORATION**

\* \* \* \* \*

**STATEMENT OF TELEVISION OWNERSHIP  
AND  
A PROPOSAL TO INCREASE BROADCAST DIVERSITY**

The Commission's pending ownership rulemakings should be the vehicle for new rules reflecting the current competitive marketplace and, at the same time, creating a structure that will increase minority, female and new entrant ownership of television stations. There are two significant prongs to this plan.

**Maintain the Existing UHF Discount in Calculating National  
Television Ownership to Encourage Emerging Networks**

- ▶ The discount has been in place for 13 years and has been a major factor in the growth of UHF television.
- ▶ UHF television stations continue to operate with technical and economic disadvantages to VHF stations as consistently reflected in ratings disparities.
- ▶ DTV is continuing the UHF handicap with inadequate power allotments and cable carriage cannot eliminate the UHF/VHF disparity.
- ▶ Retaining the UHF discount serves the Commission's diversity and competition goals by encouraging the development of emerging networks such as PAXTV, WB, UPN, Univision and Telemundo.
- ▶ The emerging networks are built upon UHF stations and must, to be economically viable, own a significant portion of their distribution.

**Retain the Single Majority Shareholder Rule as a Vehicle for Increasing  
Minority, Female and New Entrant Ownership of Television Stations**

- ▶ The single majority shareholder rule will permit the emerging networks to hold up to 49% of the voting stock of a female, minority or new entrant-controlled station without having that station be attributable to the emerging network for either national or local ownership purposes.
-

- 
- ▶ The emerging network would provide programming to the station via a standard Affiliation Agreement.
  - ▶ The emerging network would work with the majority owner to obtain third party (e.g., bank) financing for the construction or purchase of the station.
  - ▶ The emerging network would not have any option to purchase the station.
  - ▶ The station licensee would be provided with significant time on a daily basis for the broadcast of non-network, local programming.
  - ▶ The single majority shareholder would be in control of the ownership, programming, operation and ultimate disposition of the station.
-

DOW, LOHNES & ALBERTSON, PLLC  
ATTORNEYS AT LAW

COPY

JOHN R. FEORE, JR.  
DIRECT DIAL 202-776-2786  
jfeore@dialaw.com

WASHINGTON, D.C.  
1200 NEW HAMPSHIRE AVENUE, N.W. • SUITE 800 • WASHINGTON, D.C. 20036-6802  
TELEPHONE 202-776-2000 • FACSIMILE 202-776-2222

ONE RAVINIA DRIVE • SUITE 1600  
ATLANTA, GEORGIA 30346-2108  
TELEPHONE 770-901-8800  
FACSIMILE 770-901-8874

November 20, 1998

**VIA HAND DELIVERY**

Commissioner Susan Ness  
Federal Communications Commission  
1919 M Street, N.W., Room 832  
Washington, D.C. 20554

Dear Commissioner Ness:

On behalf of Bud Paxson and Paxson Communications Corporation ("Paxson"), I am forwarding to you Paxson's Proposal for increasing the diversity of television ownership and encouraging the development of emerging television networks through the retention and utilization of the UHF discount and single majority shareholder rule. Paxson has discussed this Proposal with members of the Senate Communications Subcommittee and the House Telecommunications Subcommittee and members of both Subcommittees are expected to contact you to register their support for the Paxson Proposal.

Best regards.

Cordially yours,

John R. Feore, Jr.

JRF/ljs  
Enclosure  
cc: Anita Wallgren, Legal Advisor



---

**POSITIONS FOR FCC POLICY DECISIONS - DECEMBER, 1998  
PRESENTED BY  
PAXSON COMMUNICATIONS CORPORATION**

\* \* \* \* \*

**STATEMENT OF TELEVISION OWNERSHIP  
AND  
A PROPOSAL TO INCREASE BROADCAST DIVERSITY**

The Commission's pending ownership rulemakings should be the vehicle for new rules reflecting the current competitive marketplace and, at the same time, creating a structure that will increase minority, female and new entrant ownership of television stations. There are two significant prongs to this plan.

**Maintain the Existing UHF Discount in Calculating National  
Television Ownership to Encourage Emerging Networks**

- ▶ The discount has been in place for 13 years and has been a major factor in the growth of UHF television.
- ▶ UHF television stations continue to operate with technical and economic disadvantages to VHF stations as consistently reflected in ratings disparities.
- ▶ DTV is continuing the UHF handicap with inadequate power allotments and cable carriage cannot eliminate the UHF/VHF disparity.
- ▶ Retaining the UHF discount serves the Commission's diversity and competition goals by encouraging the development of emerging networks such as PAXTV, WB, UPN, Univision and Telemundo.
- ▶ The emerging networks are built upon UHF stations and must, to be economically viable, own a significant portion of their distribution.

**Retain the Single Majority Shareholder Rule as a Vehicle for Increasing  
Minority, Female and New Entrant Ownership of Television Stations**

- ▶ The single majority shareholder rule will permit the emerging networks to hold up to 49% of the voting stock of a female, minority or new entrant-controlled station without having that station be attributable to the emerging network for either national or local ownership purposes.
-

- 
- ▶ The emerging network would provide programming to the station via a standard Affiliation Agreement.
  - ▶ The emerging network would work with the majority owner to obtain third party (e.g., bank) financing for the construction or purchase of the station.
  - ▶ The emerging network would not have any option to purchase the station.
  - ▶ The station licensee would be provided with significant time on a daily basis for the broadcast of non-network, local programming.
  - ▶ The single majority shareholder would be in control of the ownership, programming, operation and ultimate disposition of the station.
-

DOW, LOHNES & ALBERTSON, PLLC  
ATTORNEYS AT LAW

COPY

JOHN R. FEORE, JR.  
DIRECT DIAL 202-776-2786  
jfeore@dlalaw.com

WASHINGTON, D.C.  
1200 NEW HAMPSHIRE AVENUE, N.W. • SUITE 800 • WASHINGTON, D.C. 20036-6802  
TELEPHONE 202-776-2000 • FACSIMILE 202-776-2222

ONE RAVINIA DRIVE • SUITE 1600  
ATLANTA, GEORGIA 30346-2108  
TELEPHONE 770-901-8800  
FACSIMILE 770-901-8874

November 20, 1998

**VIA HAND DELIVERY**

Commissioner Susan Ness  
Federal Communications Commission  
1919 M Street, N.W., Room 832  
Washington, D.C. 20554

Dear Commissioner Ness:

On behalf of Bud Paxson and Paxson Communications Corporation ("Paxson"), I am forwarding to you Paxson's Proposal for increasing the diversity of television ownership and encouraging the development of emerging television networks through the retention and utilization of the UHF discount and single majority shareholder rule. Paxson has discussed this Proposal with members of the Senate Communications Subcommittee and the House Telecommunications Subcommittee and members of both Subcommittees are expected to contact you to register their support for the Paxson Proposal.

Best regards.

Cordially yours,

John R. Feore, Jr.

JRF/lis  
Enclosure  
cc: Anita Wallgren, Legal Advisor

---

**POSITIONS FOR FCC POLICY DECISIONS - DECEMBER, 1998  
PRESENTED BY  
PAXSON COMMUNICATIONS CORPORATION**

\* \* \* \* \*

**STATEMENT OF TELEVISION OWNERSHIP  
AND  
A PROPOSAL TO INCREASE BROADCAST DIVERSITY**

The Commission's pending ownership rulemakings should be the vehicle for new rules reflecting the current competitive marketplace and, at the same time, creating a structure that will increase minority, female and new entrant ownership of television stations. There are two significant prongs to this plan.

**Maintain the Existing UHF Discount in Calculating National  
Television Ownership to Encourage Emerging Networks**

- ▶ The discount has been in place for 13 years and has been a major factor in the growth of UHF television.
- ▶ UHF television stations continue to operate with technical and economic disadvantages to VHF stations as consistently reflected in ratings disparities.
- ▶ DTV is continuing the UHF handicap with inadequate power allotments and cable carriage cannot eliminate the UHF/VHF disparity.
- ▶ Retaining the UHF discount serves the Commission's diversity and competition goals by encouraging the development of emerging networks such as PAXTV, WB, UPN, Univision and Telemundo.
- ▶ The emerging networks are built upon UHF stations and must, to be economically viable, own a significant portion of their distribution.

**Retain the Single Majority Shareholder Rule as a Vehicle for Increasing  
Minority, Female and New Entrant Ownership of Television Stations**

- ▶ The single majority shareholder rule will permit the emerging networks to hold up to 49% of the voting stock of a female, minority or new entrant-controlled station without having that station be attributable to the emerging network for either national or local ownership purposes.
-

- 
- ▶ The emerging network would provide programming to the station via a standard Affiliation Agreement.
  - ▶ The emerging network would work with the majority owner to obtain third party (e.g., bank) financing for the construction or purchase of the station.
  - ▶ The emerging network would not have any option to purchase the station.
  - ▶ The station licensee would be provided with significant time on a daily basis for the broadcast of non-network, local programming.
  - ▶ The single majority shareholder would be in control of the ownership, programming, operation and ultimate disposition of the station.
-

DOW, LOHNES & ALBERTSON, PLLC  
ATTORNEYS AT LAW

COPY

JOHN R. FEORE, JR.  
DIRECT DIAL 202-776-2786  
jfeore@dlalaw.com

WASHINGTON, D.C.  
1200 NEW HAMPSHIRE AVENUE, N.W. • SUITE 800 • WASHINGTON, D.C. 20036-6802  
TELEPHONE 202-776-2000 • FACSIMILE 202-776-2222

ONE RAVINIA DRIVE • SUITE 1600  
ATLANTA, GEORGIA 30346-2108  
TELEPHONE 770-901-8800  
FACSIMILE 770-901-8874

November 20, 1998

**VIA HAND DELIVERY**

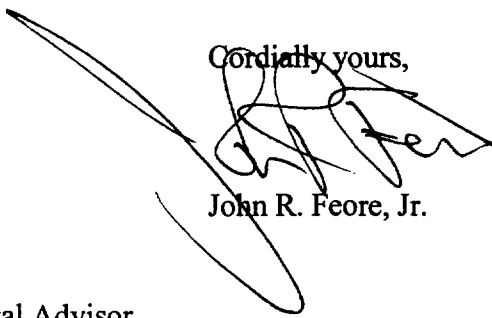
Commissioner Harold Furchtgott-Roth  
Federal Communications Commission  
1919 M Street, N.W., Room 802  
Washington, D.C. 20554

Dear Commissioner Furchtgott-Roth:

On behalf of Bud Paxson and Paxson Communications Corporation ("Paxson"), I am forwarding to you Paxson's Proposal for increasing the diversity of television ownership and encouraging the development of emerging television networks through the retention and utilization of the UHF discount and single majority shareholder rule. Paxson has discussed this Proposal with members of the Senate Communications Subcommittee and the House Telecommunications Subcommittee and members of both Subcommittees are expected to contact you to register their support for the Paxson Proposal.

Best regards.

Cordially yours,

  
John R. Feore, Jr.

JRF/ljs

Enclosure

cc: Helgi C. Walker, Legal Advisor

---

**POSITIONS FOR FCC POLICY DECISIONS - DECEMBER, 1998  
PRESENTED BY  
PAXSON COMMUNICATIONS CORPORATION**

\* \* \* \* \*

**STATEMENT OF TELEVISION OWNERSHIP  
AND  
A PROPOSAL TO INCREASE BROADCAST DIVERSITY**

The Commission's pending ownership rulemakings should be the vehicle for new rules reflecting the current competitive marketplace and, at the same time, creating a structure that will increase minority, female and new entrant ownership of television stations. There are two significant prongs to this plan.

**Maintain the Existing UHF Discount in Calculating National  
Television Ownership to Encourage Emerging Networks**

- ▶ The discount has been in place for 13 years and has been a major factor in the growth of UHF television.
- ▶ UHF television stations continue to operate with technical and economic disadvantages to VHF stations as consistently reflected in ratings disparities.
- ▶ DTV is continuing the UHF handicap with inadequate power allotments and cable carriage cannot eliminate the UHF/VHF disparity.
- ▶ Retaining the UHF discount serves the Commission's diversity and competition goals by encouraging the development of emerging networks such as PAXTV, WB, UPN, Univision and Telemundo.
- ▶ The emerging networks are built upon UHF stations and must, to be economically viable, own a significant portion of their distribution.

**Retain the Single Majority Shareholder Rule as a Vehicle for Increasing  
Minority, Female and New Entrant Ownership of Television Stations**

- ▶ The single majority shareholder rule will permit the emerging networks to hold up to 49% of the voting stock of a female, minority or new entrant-controlled station without having that station be attributable to the emerging network for either national or local ownership purposes.
-

- 
- ▶ The emerging network would provide programming to the station via a standard Affiliation Agreement.
  - ▶ The emerging network would work with the majority owner to obtain third party (e.g., bank) financing for the construction or purchase of the station.
  - ▶ The emerging network would not have any option to purchase the station.
  - ▶ The station licensee would be provided with significant time on a daily basis for the broadcast of non-network, local programming.
  - ▶ The single majority shareholder would be in control of the ownership, programming, operation and ultimate disposition of the station.
-



DOW, LOHNES & ALBERTSON, PLLC  
ATTORNEYS AT LAW

COPY

JOHN R. FEORE, JR.  
DIRECT DIAL 202-776-2786  
jfeore@dlalaw.com

WASHINGTON, D.C.  
1200 NEW HAMPSHIRE AVENUE, N.W. • SUITE 800 • WASHINGTON, D.C. 20036-6802  
TELEPHONE 202-776-2000 • FACSIMILE 202-776-2222

ONE RAVINIA DRIVE • SUITE 1600  
ATLANTA, GEORGIA 30346-2108  
TELEPHONE 770-901-8800  
FACSIMILE 770-901-8874

November 20, 1998

**VIA HAND DELIVERY**

Commissioner Harold Furchtgott-Roth  
Federal Communications Commission  
1919 M Street, N.W., Room 802  
Washington, D.C. 20554

Dear Commissioner Furchtgott-Roth:

On behalf of Bud Paxson and Paxson Communications Corporation ("Paxson"), I am forwarding to you Paxson's Proposal for increasing the diversity of television ownership and encouraging the development of emerging television networks through the retention and utilization of the UHF discount and single majority shareholder rule. Paxson has discussed this Proposal with members of the Senate Communications Subcommittee and the House Telecommunications Subcommittee and members of both Subcommittees are expected to contact you to register their support for the Paxson Proposal.

Best regards.

Cordially yours,

  
John R. Feore, Jr.

JRF/lis

Enclosure

cc: Helgi C. Walker, Legal Advisor

---

**POSITIONS FOR FCC POLICY DECISIONS - DECEMBER, 1998  
PRESENTED BY  
PAXSON COMMUNICATIONS CORPORATION**

\* \* \* \* \*

**STATEMENT OF TELEVISION OWNERSHIP  
AND  
A PROPOSAL TO INCREASE BROADCAST DIVERSITY**

The Commission's pending ownership rulemakings should be the vehicle for new rules reflecting the current competitive marketplace and, at the same time, creating a structure that will increase minority, female and new entrant ownership of television stations. There are two significant prongs to this plan.

**Maintain the Existing UHF Discount in Calculating National  
Television Ownership to Encourage Emerging Networks**

- ▶ The discount has been in place for 13 years and has been a major factor in the growth of UHF television.
- ▶ UHF television stations continue to operate with technical and economic disadvantages to VHF stations as consistently reflected in ratings disparities.
- ▶ DTV is continuing the UHF handicap with inadequate power allotments and cable carriage cannot eliminate the UHF/VHF disparity.
- ▶ Retaining the UHF discount serves the Commission's diversity and competition goals by encouraging the development of emerging networks such as PAXTV, WB, UPN, Univision and Telemundo.
- ▶ The emerging networks are built upon UHF stations and must, to be economically viable, own a significant portion of their distribution.

**Retain the Single Majority Shareholder Rule as a Vehicle for Increasing  
Minority, Female and New Entrant Ownership of Television Stations**

- ▶ The single majority shareholder rule will permit the emerging networks to hold up to 49% of the voting stock of a female, minority or new entrant-controlled station without having that station be attributable to the emerging network for either national or local ownership purposes.
-

- 
- ▶ The emerging network would provide programming to the station via a standard Affiliation Agreement.
  - ▶ The emerging network would work with the majority owner to obtain third party (e.g., bank) financing for the construction or purchase of the station.
  - ▶ The emerging network would not have any option to purchase the station.
  - ▶ The station licensee would be provided with significant time on a daily basis for the broadcast of non-network, local programming.
  - ▶ The single majority shareholder would be in control of the ownership, programming, operation and ultimate disposition of the station.
-

DOW, LOHNES & ALBERTSON, PLLC  
ATTORNEYS AT LAW

COPY

JOHN R. FEORE, JR.  
DIRECT DIAL 202-776-2786  
jfeore@dlaalaw.com

WASHINGTON, D.C.  
1200 NEW HAMPSHIRE AVENUE, N.W. • SUITE 800 • WASHINGTON, D.C. 20036-6802  
TELEPHONE 202-776-2000 • FACSIMILE 202-776-2222

ONE RAVINIA DRIVE • SUITE 1600  
ATLANTA, GEORGIA 30346-2108  
TELEPHONE 770-901-8800  
FACSIMILE 770-901-8874

November 20, 1998

**VIA HAND DELIVERY**

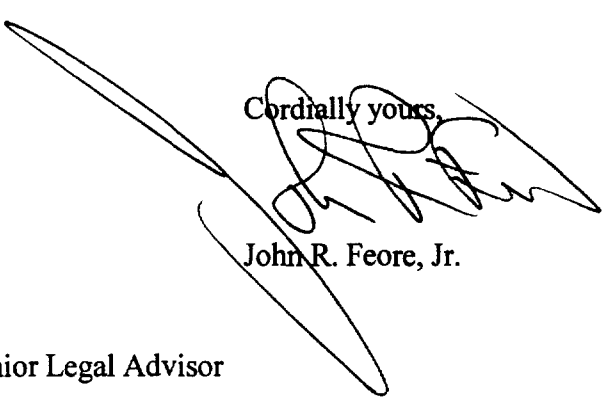
Commissioner Michael K. Powell  
Federal Communications Commission  
1919 M Street, N.W., Room 844  
Washington, D.C. 20554

Dear Commissioner Powell:

On behalf of Bud Paxson and Paxson Communications Corporation ("Paxson"), I am forwarding to you Paxson's Proposal for increasing the diversity of television ownership and encouraging the development of emerging television networks through the retention and utilization of the UHF discount and single majority shareholder rule. Paxson has discussed this Proposal with members of the Senate Communications Subcommittee and the House Telecommunications Subcommittee and members of both Subcommittees are expected to contact you to register their support for the Paxson Proposal.

Best regards.

Cordially yours,

  
John R. Feore, Jr.

JRF/lis  
Enclosure  
cc: Jane E. Mago, Senior Legal Advisor

---

**POSITIONS FOR FCC POLICY DECISIONS - DECEMBER, 1998**  
**PRESENTED BY**  
**PAXSON COMMUNICATIONS CORPORATION**

\* \* \* \* \*

**STATEMENT OF TELEVISION OWNERSHIP**  
**AND**  
**A PROPOSAL TO INCREASE BROADCAST DIVERSITY**

The Commission's pending ownership rulemakings should be the vehicle for new rules reflecting the current competitive marketplace and, at the same time, creating a structure that will increase minority, female and new entrant ownership of television stations. There are two significant prongs to this plan.

**Maintain the Existing UHF Discount in Calculating National Television Ownership to Encourage Emerging Networks**

- ▶ The discount has been in place for 13 years and has been a major factor in the growth of UHF television.
- ▶ UHF television stations continue to operate with technical and economic disadvantages to VHF stations as consistently reflected in ratings disparities.
- ▶ DTV is continuing the UHF handicap with inadequate power allotments and cable carriage cannot eliminate the UHF/VHF disparity.
- ▶ Retaining the UHF discount serves the Commission's diversity and competition goals by encouraging the development of emerging networks such as PAXtv, WB, UPN, Univision and Telemundo.
- ▶ The emerging networks are built upon UHF stations and must, to be economically viable, own a significant portion of their distribution.

**Retain the Single Majority Shareholder Rule as a Vehicle for Increasing Minority, Female and New Entrant Ownership of Television Stations**

- ▶ The single majority shareholder rule will permit the emerging networks to hold up to 49% of the voting stock of a female, minority or new entrant-controlled station without having that station be attributable to the emerging network for either national or local ownership purposes.
-

- 
- ▶ The emerging network would provide programming to the station via a standard Affiliation Agreement.
  - ▶ The emerging network would work with the majority owner to obtain third party (e.g., bank) financing for the construction or purchase of the station.
  - ▶ The emerging network would not have any option to purchase the station.
  - ▶ The station licensee would be provided with significant time on a daily basis for the broadcast of non-network, local programming.
  - ▶ The single majority shareholder would be in control of the ownership, programming, operation and ultimate disposition of the station.
-

DOW, LOHNES & ALBERTSON, PLLC  
ATTORNEYS AT LAW

COPY

JOHN R. FEORE, JR.  
DIRECT DIAL 202-776-2786  
jfeore@dlalaw.com

WASHINGTON, D.C.  
1200 NEW HAMPSHIRE AVENUE, N.W. • SUITE 800 • WASHINGTON, D.C. 20036-6802  
TELEPHONE 202-776-2000 • FACSIMILE 202-776-2222

ONE RAVINIA DRIVE • SUITE 1600  
ATLANTA, GEORGIA 30346-2108  
TELEPHONE 770-901-8800  
FACSIMILE 770-901-8874

November 20, 1998

***VIA HAND DELIVERY***

Commissioner Michael K. Powell  
Federal Communications Commission  
1919 M Street, N.W., Room 844  
Washington, D.C. 20554

Dear Commissioner Powell:

On behalf of Bud Paxson and Paxson Communications Corporation ("Paxson"), I am forwarding to you Paxson's Proposal for increasing the diversity of television ownership and encouraging the development of emerging television networks through the retention and utilization of the UHF discount and single majority shareholder rule. Paxson has discussed this Proposal with members of the Senate Communications Subcommittee and the House Telecommunications Subcommittee and members of both Subcommittees are expected to contact you to register their support for the Paxson Proposal.

Best regards.

Cordially yours,

John R. Feore, Jr.

JRF/ljs  
Enclosure  
cc: Jane E. Mago, Senior Legal Advisor

---

**POSITIONS FOR FCC POLICY DECISIONS - DECEMBER, 1998  
PRESENTED BY  
PAXSON COMMUNICATIONS CORPORATION**

\* \* \* \* \*

**STATEMENT OF TELEVISION OWNERSHIP  
AND  
A PROPOSAL TO INCREASE BROADCAST DIVERSITY**

The Commission's pending ownership rulemakings should be the vehicle for new rules reflecting the current competitive marketplace and, at the same time, creating a structure that will increase minority, female and new entrant ownership of television stations. There are two significant prongs to this plan.

**Maintain the Existing UHF Discount in Calculating National  
Television Ownership to Encourage Emerging Networks**

- ▶ The discount has been in place for 13 years and has been a major factor in the growth of UHF television.
- ▶ UHF television stations continue to operate with technical and economic disadvantages to VHF stations as consistently reflected in ratings disparities.
- ▶ DTV is continuing the UHF handicap with inadequate power allotments and cable carriage cannot eliminate the UHF/VHF disparity.
- ▶ Retaining the UHF discount serves the Commission's diversity and competition goals by encouraging the development of emerging networks such as PAXTV, WB, UPN, Univision and Telemundo.
- ▶ The emerging networks are built upon UHF stations and must, to be economically viable, own a significant portion of their distribution.

**Retain the Single Majority Shareholder Rule as a Vehicle for Increasing  
Minority, Female and New Entrant Ownership of Television Stations**

- ▶ The single majority shareholder rule will permit the emerging networks to hold up to 49% of the voting stock of a female, minority or new entrant-controlled station without having that station be attributable to the emerging network for either national or local ownership purposes.
-



- 
- ▶ The emerging network would provide programming to the station via a standard Affiliation Agreement.
  - ▶ The emerging network would work with the majority owner to obtain third party (e.g., bank) financing for the construction or purchase of the station.
  - ▶ The emerging network would not have any option to purchase the station.
  - ▶ The station licensee would be provided with significant time on a daily basis for the broadcast of non-network, local programming.
  - ▶ The single majority shareholder would be in control of the ownership, programming, operation and ultimate disposition of the station.
-

DOW, LOHNES & ALBERTSON, PLLC  
ATTORNEYS AT LAW

COPY

JOHN R. FEORE, JR.  
DIRECT DIAL 202-776-2786  
jfeore@dlalaw.com

WASHINGTON, D.C.  
1200 NEW HAMPSHIRE AVENUE, N.W. • SUITE 800 • WASHINGTON, D.C. 20036-6802  
TELEPHONE 202-776-2000 • FACSIMILE 202-776-2222

ONE RAVINIA DRIVE • SUITE 1600  
ATLANTA, GEORGIA 30346-2108  
TELEPHONE 770-901-8800  
FACSIMILE 770-901-8874

November 20, 1998

**VIA HAND DELIVERY**

Commissioner Gloria Tristani  
Federal Communications Commission  
1919 M Street, N.W., Room 826  
Washington, D.C. 20554

Dear Commissioner Tristani:

On behalf of Bud Paxson and Paxson Communications Corporation ("Paxson"), I am forwarding to you Paxson's Proposal for increasing the diversity of television ownership and encouraging the development of emerging television networks through the retention and utilization of the UHF discount and single majority shareholder rule. Paxson has discussed this Proposal with members of the Senate Communications Subcommittee and the House Telecommunications Subcommittee and members of both Subcommittees are expected to contact you to register their support for the Paxson Proposal.

Best regards.

Cordially yours,

  
John R. Feore, Jr.

JRF/lis  
Enclosure  
cc: Rick Chessen, Senior Legal Advisor

---

**POSITIONS FOR FCC POLICY DECISIONS - DECEMBER, 1998  
PRESENTED BY  
PAXSON COMMUNICATIONS CORPORATION**

\* \* \* \* \*

**STATEMENT OF TELEVISION OWNERSHIP  
AND  
A PROPOSAL TO INCREASE BROADCAST DIVERSITY**

The Commission's pending ownership rulemakings should be the vehicle for new rules reflecting the current competitive marketplace and, at the same time, creating a structure that will increase minority, female and new entrant ownership of television stations. There are two significant prongs to this plan.

**Maintain the Existing UHF Discount in Calculating National  
Television Ownership to Encourage Emerging Networks**

- ▶ The discount has been in place for 13 years and has been a major factor in the growth of UHF television.
- ▶ UHF television stations continue to operate with technical and economic disadvantages to VHF stations as consistently reflected in ratings disparities.
- ▶ DTV is continuing the UHF handicap with inadequate power allotments and cable carriage cannot eliminate the UHF/VHF disparity.
- ▶ Retaining the UHF discount serves the Commission's diversity and competition goals by encouraging the development of emerging networks such as PAXTV, WB, UPN, Univision and Telemundo.
- ▶ The emerging networks are built upon UHF stations and must, to be economically viable, own a significant portion of their distribution.

**Retain the Single Majority Shareholder Rule as a Vehicle for Increasing  
Minority, Female and New Entrant Ownership of Television Stations**

- ▶ The single majority shareholder rule will permit the emerging networks to hold up to 49% of the voting stock of a female, minority or new entrant-controlled station without having that station be attributable to the emerging network for either national or local ownership purposes.
-

- 
- ▶ The emerging network would provide programming to the station via a standard Affiliation Agreement.
  - ▶ The emerging network would work with the majority owner to obtain third party (e.g., bank) financing for the construction or purchase of the station.
  - ▶ The emerging network would not have any option to purchase the station.
  - ▶ The station licensee would be provided with significant time on a daily basis for the broadcast of non-network, local programming.
  - ▶ The single majority shareholder would be in control of the ownership, programming, operation and ultimate disposition of the station.
-

DOW, LOHNES & ALBERTSON, PLLC  
ATTORNEYS AT LAW

COPY

JOHN R. FEORE, JR.  
DIRECT DIAL 202-776-2786  
jfeore@dlalaw.com

WASHINGTON, D.C.  
1200 NEW HAMPSHIRE AVENUE, N.W. • SUITE 800 • WASHINGTON, D.C. 20036-6802  
TELEPHONE 202-776-2000 • FACSIMILE 202-776-2222

ONE RAVINIA DRIVE • SUITE 1600  
ATLANTA, GEORGIA 30346-2108  
TELEPHONE 770-901-8800  
FACSIMILE 770-901-8874

November 20, 1998

**VIA HAND DELIVERY**

Commissioner Gloria Tristani  
Federal Communications Commission  
1919 M Street, N.W., Room 826  
Washington, D.C. 20554

Dear Commissioner Tristani:

On behalf of Bud Paxson and Paxson Communications Corporation ("Paxson"), I am forwarding to you Paxson's Proposal for increasing the diversity of television ownership and encouraging the development of emerging television networks through the retention and utilization of the UHF discount and single majority shareholder rule. Paxson has discussed this Proposal with members of the Senate Communications Subcommittee and the House Telecommunications Subcommittee and members of both Subcommittees are expected to contact you to register their support for the Paxson Proposal.

Best regards.

Cordially yours,

John R. Feore, Jr.

JRF/lis  
Enclosure  
cc: Rick Chessen, Senior Legal Advisor

---

**POSITIONS FOR FCC POLICY DECISIONS - DECEMBER, 1998  
PRESENTED BY  
PAXSON COMMUNICATIONS CORPORATION**

\* \* \* \* \*

**STATEMENT OF TELEVISION OWNERSHIP  
AND  
A PROPOSAL TO INCREASE BROADCAST DIVERSITY**

The Commission's pending ownership rulemakings should be the vehicle for new rules reflecting the current competitive marketplace and, at the same time, creating a structure that will increase minority, female and new entrant ownership of television stations. There are two significant prongs to this plan.

**Maintain the Existing UHF Discount in Calculating National  
Television Ownership to Encourage Emerging Networks**

- ▶ The discount has been in place for 13 years and has been a major factor in the growth of UHF television.
- ▶ UHF television stations continue to operate with technical and economic disadvantages to VHF stations as consistently reflected in ratings disparities.
- ▶ DTV is continuing the UHF handicap with inadequate power allotments and cable carriage cannot eliminate the UHF/VHF disparity.
- ▶ Retaining the UHF discount serves the Commission's diversity and competition goals by encouraging the development of emerging networks such as PAXTV, WB, UPN, Univision and Telemundo.
- ▶ The emerging networks are built upon UHF stations and must, to be economically viable, own a significant portion of their distribution.

**Retain the Single Majority Shareholder Rule as a Vehicle for Increasing  
Minority, Female and New Entrant Ownership of Television Stations**

- ▶ The single majority shareholder rule will permit the emerging networks to hold up to 49% of the voting stock of a female, minority or new entrant-controlled station without having that station be attributable to the emerging network for either national or local ownership purposes.
-

- 
- ▶ The emerging network would provide programming to the station via a standard Affiliation Agreement.
  - ▶ The emerging network would work with the majority owner to obtain third party (e.g., bank) financing for the construction or purchase of the station.
  - ▶ The emerging network would not have any option to purchase the station.
  - ▶ The station licensee would be provided with significant time on a daily basis for the broadcast of non-network, local programming.
  - ▶ The single majority shareholder would be in control of the ownership, programming, operation and ultimate disposition of the station.
-